

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI  
GREENVILLE DIVISION**

<b>WESLEY REED, et al.</b>	)	
<b>v.</b>	)	
<b>PITTS FARMS PARTNERSHIP</b>	)	
	)	

**Plaintiffs**

**Civil Action No. 4:21-cv-00113-DAS**

**Defendant**

**NOTICE OF DEPOSITION OF PLAINTIFF, GREGORY STRONG**

PLEASE TAKE NOTICE that Defendant, Pitts Farms Partnership (“Defendant”), pursuant to Fed. R. Civ. P. 30, will take the deposition of Plaintiff, Gregory Strong on Tuesday, October 25, 2022, immediately following the deposition of Plaintiff, Richard Strong, at the Mississippi Center for Justice, 120 Court Ave., Indianola, Mississippi 38751.

The deposition may be taken by videotape and/or digital video and stenographic means, before a notary public, or some other officer authorized to administer oaths. The deposition will continue day to day until completed.

You are hereby notified to have the plaintiff appear, and you are invited to take such part in the examination as you deem appropriate.

This the 17<sup>th</sup> day of October, 2022.

**PITTS FARMS PARTNERSHIP,**

Defendant

BY: /s/ Timothy M. Threadgill  
TIMOTHY M. THREADGILL (MSB #8886)  
SAMMY L. BROWN, JR. (MSB #106046)

ITS ATTORNEYS

OF COUNSEL:

BUTLER SNOW LLP  
1020 Highland Colony Parkway, Suite 1400  
Ridgeland, MS 39157  
Post Office Box 6010  
Ridgeland, MS 39158-6010  
Tel: (601) 948-5711  
Fax: (601) 985-4500  
Email: [tim.threadgill@butlersnow.com](mailto:tim.threadgill@butlersnow.com)  
Email: [sammy.brown@butlersnow.com](mailto:sammy.brown@butlersnow.com)

**CERTIFICATE OF SERVICE**

I, Timothy M. Threagill, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to the following:

Robert McDuff, Esq.  
MISSISSIPPI CENTER FOR JUSTICE  
767 North Congress Street  
Jackson, MS 39202  
[rbm@mcdufflaw.com](mailto:rbm@mcdufflaw.com)

Gregory Schell, Esq.  
Melia Amal Bouhabib, Esq.  
*Pro Hac Vice*  
SOUTHERN MIGRANT LEGAL SERVICES  
A Project of Texas RioGrande Legal Aid, Inc.  
311 Plus Park Blvd., Ste. 135  
Nashville, TN 37217  
[gschell@trla.org](mailto:gschell@trla.org)  
[abouhabib@trla.org](mailto:abouhabib@trla.org)

Ty Pinkins, MS Bar No. 106398  
MISSISSIPPI CENTER FOR JUSTICE  
120 Court Ave.  
Indianola, MS 38751  
[tpinkins@mscenterforjustice.org](mailto:tpinkins@mscenterforjustice.org)

SO CERTIFIED, this the 17<sup>th</sup> day of October, 2022.

/s/ Timothy M. Threadgill  
Timothy M. Threadgill